

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-------------------------------|---|-----------------------------|
| LESLEY S. MITCHELL |) | Civil Action No. 05-80 ERIE |
| |) | Judge Sean J. McLaughlin |
| Plaintiff |) | |
| |) | |
| v. |) | ELECTRONICALLY FILED |
| |) | |
| TOWNSHIP OF MILLCREEK, et al. |) | |
| |) | |
| Defendant |) | |

**MOTION TO AMEND CASE MANAGEMENT ORDER
TO EXTEND THE DEADLINE FOR FILING DISPOSITIVE MOTIONS**

AND NOW, this 24th day of March, 2006, come Defendants, Township of Millcreek and Millcreek Township Police Department, by and through their attorneys, Knox McLaughlin Gornall & Sennett, P.C., motioning the Court to amend the Case Management Order to extend the deadline for filing dispositive motions, stating in support thereof the following:

1. Pursuant to the Court's revised Case Management Order dated November 28, 2005, the discovery period ends on March 27, 2006.
2. The Court's November 28th Order also provided filing deadlines for dispositive motions, pretrial narratives and other matters.
3. The current deadline for dispositive motions also is March 27, 2006.
4. The Court has scheduled a settlement conference for March 31, 2006.
5. The undersigned counsel for Defendants requests a 21-day extension of the deadline for filing dispositive motions to April 17th. This would be approximately two weeks after the currently scheduled March 31 settlement conference.

6. It is believed that this amendment would conform the pretrial schedule to what is believed to be the Court's standard scheduling sequence and would permit Defendants an appropriate opportunity to review the totality of evidence produced during discovery in preparation of their dispositive motion.

7. Counsel for Plaintiff has advised the undersigned that he does not object to Defendants' request set forth herein.

8. No prejudice would result if the Court were to grant this motion.

WHEREFORE, Defendants, Township of Millcreek and Millcreek Township Police Department, respectfully request the Court to modify the pretrial schedule by extending the deadline for dispositive motions to April 17, 2006.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.

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